

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

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My Pillow, Inc.; Michael J. Lindell; Mike  
Lindell Products LLC; Lindell Media LLC;  
Lindell Technologies, LLC; Lindell  
Properties, LLC; Lindell Publishing, LLC;  
Lindell Services, LLC; Lindell Management,  
LLC; Prior Lake 40 Acres, LLC; and  
Lindell-TV LLC,

Civ No.: 0:24-cv-04535-JMB-TNL

Plaintiffs,

v.

Lifetime Funding, LLC; FunderZgroup,  
LLC; Michael Kandkhorov; Michael Kand;  
Abe Kand; Tiffany Johnson; Sam  
Hernandez; Alan Hernandez; CapShot  
Financial; and John and Jane Does,

Defendants.

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**DECLARATION OF RICHARD R. VOELBEL**

1. I am over twenty-one years of age, competent to testify in a legal proceeding, and give this Declaration of my own personal knowledge.

2. I am counsel in this action for Defendants Lifetime Funding, LLC (“Lifetime”), FunderZgroup, LLC (“Funderzgroup”), Michael Kandkhorov, Michael Kandhorov (a/k/a Michael Kand), and Abraham Kandhorov (a/k/a Abe Kand) (together, “Defendants”).

3. I offer this Declaration in support of Defendants’ motion to dismiss Plaintiffs’ Complaint.

4. A true and correct screenprint of the entity information page for Lifetime Funding LLC from the New York Department of State’s website is attached hereto as **Exhibit 1**.

5. A true and correct screenprint of the entity information page for Lifetime Funding LLC from the Connecticut Secretary of State's website is attached hereto as **Exhibit 2**.

6. A true and correct screenprint of the entity information page for Funderzgroup LLC from the Florida Secretary of State's website is attached hereto as **Exhibit 3**.

7. A true and correct screenprint of the entity information page for Funderzgroup LLC from the Connecticut Secretary of State's website is attached hereto as **Exhibit 4**.

8. A true and correct copy of the Complaint filed in the action entitled *Lifetime Funding v. My Pillow Inc.*, Supreme Court of the State of New York, County of Monroe, Index No. E2024017948, is attached hereto as **Exhibit 5**.

9. A true and correct screenprint of the entity information page for My Pillow, Inc. from the Minnesota Secretary of State's website is attached hereto as **Exhibit 6**.

10. A true and correct copy of the decision in the action entitled *Flash Funding, LLC v. Horizons Connection Services, LLC*, Docket No. HHDCV236166130S (Conn. Super. Ct. 2024), is attached hereto as **Exhibit 7**.

11. A true and correct copy of the "Form Three agreement" in the action entitled *Lateral Recovery, LLC v. Cap. Merch. Servs., LLC*, 632 F. Supp. 3d 402 (S.D.N.Y. 2022), is attached hereto as **Exhibit 8**.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this the 23rd day of January, 2025.

/s/ Richard R. Voelbel  
Richard R. Voelbel